IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

INEOS FLUOR AMERICAS LLC,)
Plaintiff,)
v.) C.A. No. 06-189 (SLR)
HONEYWELL INTERNATIONAL INC.,)
Defendant.)
	<i>)</i>

AMENDED NOTICE OF DEPOSITION

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure, Defendant Honeywell International, Inc. will take the deposition upon oral examination of Robert Learman, Chief Executive Officer, INEOS Oligomers, beginning at 8:30 a.m. on April 5, 2007 at the offices of Kirkland & Ellis LLP, 153 East 53rd Street, New York, NY 10022.

The oral examination will be recorded by stenographic and videographic means, will take place before a notary public or other person authorized by law to administer oaths, and will continue from day to day until completed.

You are invited to attend and examine the witness.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

Martin P. Tully (#465)

Jason A. Cincilla (#4232)

1201 North Market Street

P.O. Box 1347

Wilmington, DE19899

(302) 658-9200

Attorneys for Defendant Honeywell

International Inc.

OF COUNSEL:

KIRKLAND & ELLIS LLP Yosef J. Riemer Andrew R. Dunlap Michael D. Reisman 153 East 53rd Street New York, NY 10022 (212) 446-4800

-and-

Mark L. Kovner Michael S. Becker Julie Brennan Jacobs 655 Fifteenth Street, NW Suite 1200 Washington, DC 20005-5793 (202) 879-5000

Dated: March 30, 2007

780852.1

CERTIFICATE OF SERVICE

I, Jason A. Cincilla, hereby certify that on March 30, 2007, my co-counsel caused copies of the foregoing document to be served upon the following counsel of record as indicated:

By Federal Express and E-mail

Richard S. Order [rso@avhlaw.com] Mark D. Alexander [mda@avhlaw.com] Axinn, Veltrop & Harkrider LLP 90 State House Square Hartford, CT 06103 (860) 275-8100

C. Barr Flinn [bflinn@ycst.com]
Karen L. Pascale [kpascale@ycst.com]
Young Conaway Stargatt & Taylor, LLP
The Brandywine Building
1000 West Street, 17th Floor
Wilmington, DE 19801
(302) 571-6600

Jason A. Cincilla (#4232)